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Attorneys for Defendants Factory Direct of Secaucus, LLC

d/b/a Ashley Furniture HomeStore, Eugene Chrinian and Kathy Martin

BY: STEVEN B. HARZ, ESQUIRE (006921977)

DANIEL C. RITSON, ESQUIRE (027802004)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

<p>ISABEL PEREZ,</p> <p>Plaintiff,</p> <p>v.</p> <p>FACTORY DIRECT OF SECAUCUS, LLC d/b/a ASHLEY FURNITURE HOMESTORE, EUGENE CHRINIAN, in his official and individual capacities, and KATHY MARTIN, in her official and individual capacities,</p> <p>Defendants.</p>	<p>CIVIL ACTION</p> <p>NO.: 2:13-cv-00327 (SDW-MCA)</p> <p>DEFENDANTS' NOTICE OF MOTION FOR SUMMARY JUDGMENT</p> <p>Oral argument requested.</p>
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TO: Ariel Y. Graff, Esquire
The Ottinger Firm, P.C.
401 Park Avenue South
New York, New York 10016
Attorneys for Plaintiff Isabel Perez

SIR:

PLEASE TAKE NOTICE that the undersigned attorneys for Defendants Factory Direct of Secaucus, LLC d/b/a Ashley Furniture HomeStore, Eugene Chrinian, and Kathy Martin (collectively, "Defendants"), will move on September 2, 2014 before the United States District Court for the District of New Jersey pursuant to Federal Rule of Procedure 56, for an Order

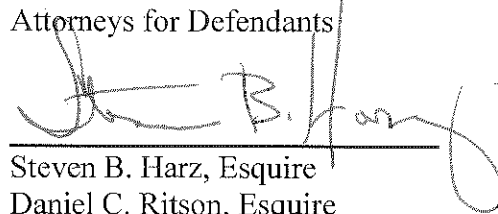
granting summary judgment to Defendants and dismissing the Amended Complaint of Plaintiff Isabel Perez.

Defendants will rely on the Statement of Material Facts Not in Dispute Pursuant to Local Civ. Rule 56.1(a), Affidavit of Neel Jhaveri, Certification of Counsel in Support of Defendants' Motion for Summary Judgment, and Defendants' Brief in Support of Motion for Summary Judgment, filed herewith.

A proposed form of Order also is filed herewith. Defendants respectfully request oral argument.

ARCHER & GREINER, P.C.

Attorneys for Defendants

A handwritten signature in black ink, appearing to read "Steven B. Harz", is written over a horizontal line.

Steven B. Harz, Esquire
Daniel C. Ritson, Esquire
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Dated: August 4, 2014

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